UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Mahmoud KHALIL,

Petitioner,

v.

Donald J. TRUMP, in his official capacity as President of the United States; William P. JOYCE, in his official capacity as Acting Field Office Director of New York, Immigration and Customs Enforcement; Caleb VITELLO, Acting Director, U.S. Immigration and Customs Enforcement; Kristi NOEM, in her official capacity as Secretary of the United States Department of Homeland Security; Marco RUBIO, in his official capacity as Secretary of State; and Pamela BONDI, in her official capacity as Attorney General, U.S. Department of Justice,

Case No. 25-cv-1963

CERTIFICATE OF SERVICE

Respondents.

I hereby certify that on March 25, 2025, I electronically filed Petitioner's Amended Memorandum of Law in Support of Petitioner's Motion for Preliminary Injunctive Relief, and a Proposed Order.

Notice of this filing will be sent to all counsel of record in this case via the Court's electronic filing system.

¹ Respondent Yolanda Pittman, in her official capacity as Warden of Elizabeth Contact Detention Facility, will be added.

Dated: March 25, 2025

NEW YORK CIVIL LIBERTIES UNION

FOUNDATION Amy Belsher* Robert Hodgson* Veronica Salama* Molly Biklen *

125 Broad Street, 19th Floor

New York, NY 10004 Tel: (212) 607-3300

CLEAR PROJECT

MAIN STREET LEGAL SERVICES, INC.

Ramzi Kassem** Naz Ahmad

Mudassar Hayat Toppa* Shezza Abboushi Dallal* **CUNY School of Law**

2 Court Square

Long Island City, NY 11101

Tel: (718) 340-4558

Dratel & Lewis Amy E. Greer

29 Broadway, Suite 1412 New York, NY 10006

Tel: (212)732-8805

WASHINGTON SQUARE LEGAL SERVICES,

INC.

IMMIGRANT RIGHTS CLINIC

Alina Das**

245 Sullivan Street, 5th Floor

New York, NY 10012 Tel: (212) 998-6430

Counsel for Petitioner *Admitted Pro Hac Vice

**Pro Hac Vice application pending or forthcoming

/s/Jeanne LoCicero

AMERICAN CIVIL LIBERTIES UNION OF

NEW JERSEY FOUNDATION

Jeanne LoCicero Farrin R. Anello Molly K.C. Linhorst

570 Broad Street, 11th Floor

Newark, NJ 07102 Tel: (973) 854-1715

AMERICAN CIVIL LIBERTIES UNION

FOUNDATION Omar Jadwat* Noor Zafar* Sidra Mahfooz* Brian Hauss*

Brett Max Kaufman* Esha Bhandari* Vera Eidelman*

Tyler Takemoto*

125 Broad Street, 18th Floor

New York, NY 10004 Tel: (212) 549-2500

CENTER FOR CONSTITUTIONAL RIGHTS

Baher Azmy Samah Sisay* Diala Shamas**

666 Broadway, 7th Floor New York, NY 10012 Tel: (212) 614-6464

VAN DER HOUT LLP Marc Van Der Hout** Johnny Sinodis** Oona Cahill**

360 Post Street, Suite 800 San Francisco, CA 94108

Tel: (415) 981-3000